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8 [Additional Counsel Listed on Signature Page]

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10 UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 IN RE: SOCIAL MEDIA ADOLESCENT
13 ADDICTION/PERSONAL INJURY PRODUCTS
14 LIABILITY LITIGATION

This Document Relates To:

Breathitt County School District, By and Through
the Breathitt County Board of Education v. Meta
Platforms Inc., et al.

Case No.: 4:23-CV-1804

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**DECLARATION OF RONALD
JOHNSON IN SUPPORT OF
PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGMENT (BREATHITT) (SD
MSJ No. 1)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF RONALD JOHNSON

I, Ronald Johnson declare under penalty of perjury:

1. I am an attorney duly admitted to practice law in Ohio and Kentucky and admitted *pro hac vice* in this Court. I am a partner at Hendy Johnson Vaughn, and am counsel for the Plaintiff Breathitt County Board of Education. I have personal knowledge of the facts stated in this Declaration, and if called upon to do so, could and would competently testify thereto.

2. I submit this Declaration in support of Plaintiff's Response in Opposition to Defendants' Motion for Summary Judgment (BREATHITT) (SD MSJ No. 1), filed concurrently with this Declaration.

3. Attached as Exhibit 1 is a true and correct copy of the Amended Rebuttal Report of Dr. Sharon A. Hoover, PhD for Breathitt County Board of Education, dated August 7, 2025.

4. Attached as Exhibit 2 is a true and correct copy of the Expert Report of Dr. Sharon A. Hoover, PhD, dated May 16, 2025.

5. Attached as Exhibit 3 is a true and correct copy of the 30(b)(6) Deposition of Phillip Watts, dated April 22, 2025.

6. Attached as Exhibit 4 is a true and correct copy of the 30(b)(1) Deposition of Jeremy Hall, dated July 28, 2025.

7. Attached as Exhibit 5 is a true and correct copy of the Affidavit of Kera Howard, dated May 9, 2025.

8. Attached as Exhibit 6 is a true and correct copy of the 30(b)(1) Deposition of Jeremy Hall, dated April 23, 2025.

9. Attached as Exhibit 7 is a true and correct copy of the 30(b)(6) Deposition of Daphne Noble, dated March 11, 2025.

10. Attached as Exhibit 8 is a true and correct copy of the 2021 KIP Survey District Report for Breathitt County, produced at BREATHITT00151339.

11. Attached as Exhibit 9 is a true and correct copy of the 30(b)(1) Deposition of Kera Howard, dated March 10, 2025.

12. Attached as Exhibit 10 is a true and correct copy of the Amended Expert Report of Dr. Sharon A. Hoover, PhD for Breathitt County Board of Education, dated June 20, 2025.

13. Attached as Exhibit 11 is a true and correct copy of the 30(b)(1) Deposition of Daphne Noble, dated July 29, 2025.

14. Attached as Exhibit 12 is a true and correct copy of the Breathitt High School Youth Service Center 2022 Needs Survey for Parents Results, produced at BREATHITT00137977.

15. Attached as Exhibit 13 is a true and correct copy of the 30(b)(6) Deposition of Hannah Watts, dated March 12, 2025.

16. Attached as Exhibit 14 is a true and correct copy of the 30(b)(6) Deposition of Kera Howard, dated March 10, 2025.

17. Attached as Exhibit 15 is a true and correct copy of the policies of the Breathitt County Board of Education, produced at BREATHITT00149001.

18. Attached as Exhibit 16 is a true and correct copy of the Affidavit of Daphne Noble, dated May 2, 2025.

19. Attached as Exhibit 17 is a true and correct copy of the Affidavit of Jeremy Hall, dated May 9, 2025.

20. Attached as Exhibit 18 is a true and correct copy of the 30(b)(1) Deposition of Phillip Watts, dated July 28, 2025.

1 21. Attached as Exhibit 19 is a true and correct copy of the Affidavit of Will Noble,
2 dated May 15, 2025.

3 22. Attached as Exhibit 20 is a true and correct copy of the 30(b)(6) Deposition of Stacy
4 McKnight, dated April 21, 2025.

5 23. Attached as Exhibit 21 is a true and correct copy of the Affidavit of Phil Watts,
6 dated May 5, 2025.

7 24. Attached as Exhibit 22 is a true and correct copy of the 30(b)(1) Deposition of
8 Daphne Noble, dated March 11, 2025.

9 25. Attached as Exhibit 23 is a true and correct copy of the Expert Report of Jeffrey E.
10 Meyers for Breathitt County School District, dated May 19, 2025.

11 26. Attached as Exhibit 24 is a true and correct copy of the 30(b)(1) Deposition of
12 William Noble, dated July 28, 2025.

13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and accurate.

15 DATED: November 07, 2025

16 BY: /s/Ronald E. Johnson, Jr.
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